



United States Attorney
Southern District of New York

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November 18, 2020

BY ECF AND EMAIL

Honorable Shelley C. Chapman
United States Bankruptcy Judge
Southern District of New York
One Bowling Green
New York, New York 10004

Re: *In re Anthony Montero*, 13-bk-12843 (SCC)

Dear Judge Chapman:

This Office represents the Department of Education (“DOE”) in the above-captioned action. On September 21, 2020, Debtor moved to reopen this bankruptcy. *See* Dkt. No. 16. On October 13, 2020, DOE opposed this motion. *See* Dkt. No. 19. On October 20, 2020, the Court held a hearing on this matter and, on October 26, 2020, denied Debtor’s request to reopen. *See* Dkt. No. 22. On November 9, 2020, Debtor moved for reconsideration of the Court’s order. *See* Dkt. No. 23. DOE writes to respectfully request a three-week extension of time to respond to Debtor’s motion for reconsideration until December 14, 2020. Debtor consents to this request.

Since the October 20, 2020 hearing, the Assistant United States Attorney assigned to this matter went on parental leave, and the undersigned was assigned this case on November 18, 2020. Accordingly, this additional time is needed in order for the undersigned to familiarize himself with the case, contact DOE, order a transcript of the October 20, 2020, hearing, and respond to Debtor’s motion for reconsideration.

Accordingly, DOE respectfully requests that it be provided until December 14, 2020, to respond to Debtor’s motion for reconsideration.

I thank the Court for its attention to this matter.

Respectfully,

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Acting United States Attorney for the
Southern District of New York

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